

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

7:19-cv-11469 (CS)

Jennifer Lopez-Barnett, individually  
and on behalf of all others similarly  
situated,

Plaintiff,

vs.

Trader Joe's Company,

Defendant.

**STIPULATION AND  
[PROPOSED] ORDER  
FURTHER EXTENDING TIME  
TO RESPOND TO  
COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned  
counsel for the parties that the time within which Defendant Trader Joe's Company may  
move, answer, or otherwise respond to the Complaint is hereby extended by 28 days, up  
to and including July 2, 2020.

This is the second request for an extension of time in connection with this matter.  
The original deadline to respond to the Complaint was May 5, 2020. The parties' first  
request for an extension was granted on April 29, 2020 (Dkt. 8).

The parties request additional time to consider how to proceed, such as a motion to  
dismiss or answer by Defendant, an amended complaint by Plaintiff, or a resolution  
between the parties. This request does not affect any other scheduled dates.

No provision of this Stipulation and Order shall be construed as a waiver of, and  
Defendant Trader Joe's Company expressly reserves, any and all defenses.

Dated: June 1, 2020

SHEEHAN & ASSOCIATES, P.C.

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*Attorney for Plaintiff Jennifer Lopez-Barnett*

Dated: June 1, 2020

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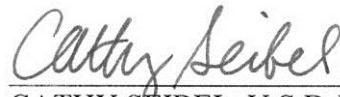
s/Rory F. Collins

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*Attorneys for Defendant Trader Joe's Company*

SO ORDERED.

  
CATHY SEIBEL, U.S.D.J. 6/1/20